

ANALYSIS OF IMPEDIMENTS

OCD has examined its proposed Project-Based Voucher (PBV) program in accordance with HUD requirements to identify any impediments to fair housing choice and to address those impediments in a reasonable fashion in view of the resources available. OCD will ensure that its subsidy administrator (SA) works with participating Owners to ensure compliance with all fair housing requirements.

Outreach

OCD will ensure the SA asks landlords to post fair housing notices.

OCD will ensure that when waiting lists are opened, there is ample and broad public notice including notification in local papers of general circulation and minority press where available, and specific outreach to organizations working with impacted households.

Training Seminar for Rental Managers, Agents, and Landlords

OCD will ensure the SA provides training seminars for participating Owners and their Management Agents. Seminar topics would include an overview of the fair housing laws (classes, illegal acts, and penalties), tenant selection criteria, family issues (occupancy standards, safety), reasonable accommodations, record keeping, advertising and evictions. See 24 CFR 100.70, 100.75, 100.80, 100.202

Filing Complaints

To further its commitment to full compliance with applicable civil rights laws, OCD will provide Federal/State/local information to applicants for and participants in the PBV program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable fair housing Information and Discrimination Complaint Forms will be made available at the OCD office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The OCD will assist any family that believes it has suffered illegal discrimination by providing a copy of the housing discrimination form. The OCD will also assist the family in completing the form, if requested, and will provide the family with the address of the nearest HUD Office of Fair Housing and Equal Opportunity. These forms will be available in Spanish and English

Reasonable Accommodation

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the OCD housing programs and related services. When such accommodations are granted they do not confer special treatment or advantage for the person with a disability; rather, they make the program fully accessible to them in a way

that would otherwise not be possible due to their disability. Because disabilities are not always apparent, the OCD will ensure that all applicants/participants are aware of the opportunity to request reasonable accommodations. OCD will ensure that Owners understand their obligations to provide reasonable accommodations to persons with disabilities.

Supportive Services

OCD will ensure that the families participating in the PBV program, all of whom will be in need of permanent supportive housing, will be offered appropriate supportive services.

Work with Local Jurisdictions to Affirmatively Further Fair Housing

OCD will work with the Department of Health and Hospitals to coordinate the delivery of CDBG-funded supportive services to PBV families, and otherwise will work with local jurisdictions to affirmatively further fair housing in any initiatives that require the PHA's involvement.